

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FRANCHISE GROUP, INC.,¹

Reorganized Debtor.

)
) Chapter 11
)
) Case No. 24-12480 (LSS)
)
) **Re: Docket No. 1845**
)

**CERTIFICATION OF COUNSEL REGARDING PROPOSED ORDER
SUSTAINING REORGANIZED DEBTORS' FIRST (1ST) OMNIBUS
(NON-SUBSTANTIVE) OBJECTION TO CLAIMS**

On August 29, 2025, the above-captioned reorganized debtor (the “Reorganized Debtor”) filed the *Reorganized Debtors’ First (1st) Omnibus (Non-Substantive) Claims Objection* [Docket No. 1845] (the “Objection”)² with the United States Bankruptcy Court for the District of Delaware (the “Court”). A proposed form of order sustaining the Objection was attached thereto as Exhibit 2 (the “Proposed Order”). Attached to the Proposed Order as Exhibits A and B, respectively, were schedules of (i) amended and superseded and (ii) duplicative claims subject to the Objection (together, the “Schedules”).

The deadline for parties to file and serve responses to the relief requested in the Objection was established as September 19, 2025 at 4:00 p.m. (prevailing Eastern Time) (the “Response Deadline”). Prior to the Response Deadline, the Reorganized Debtor received informal comments from counsel to Gregory Realty, GP (“Gregory Realty”), counsel to Buddy Mac Holding, LLC

¹ The last four digits of Franchise Group, Inc.'s federal tax identification number are 1876. The mailing address for Franchise Group, Inc. is 2371 Liberty Way, Virginia Beach, Virginia 23456. The term "Reorganized Debtors" includes Franchise Group, Inc. and certain reorganized debtor affiliates, a complete list of which, including the last four digits of their federal tax identification numbers and addresses, may be obtained on the website of the Reorganized Debtors' claims and noticing agent, at <https://cases.ra.kroll.com/FRG/>. All of the motions, contested matters, and adversary proceedings that remained open as of the closing of any of the Reorganized Debtors' cases, or that are opened after the date thereof, are administered in the remaining chapter 11 case of Franchise Group, Inc., Case No. 24-12480 (LSS).

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Objection.

(“Buddy Mac”), and counsel to CRG Financial LLC (“CRG Financial” and, collectively with Gregory Realty and Buddy Mac, the “Responding Parties”). To resolve the Responding Parties’ comments, the Reorganized Debtor made certain revisions to the Schedules, as reflected in the revised Schedules appended as Exhibits A and B to the Proposed Order (together, the “Revised Schedules”),³ attached hereto as **Exhibit 1**.⁴ For the convenience of the Court and other interested parties, a blackline comparing the Revised Schedules against the Schedules is attached hereto as **Exhibit 2**.

WHEREFORE, as the Reorganized Debtor did not receive any objections or responses other than as described herein, and the Responding Parties do not object to entry of the Proposed Order with the Revised Schedules attached thereto, the Reorganized Debtor respectfully requests that the Court enter the Proposed Order without further notice or a hearing at the Court’s earliest convenience.

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³ With CRG Financial’s consent, the Objection has been adjourned to November 18, 2025 solely with respect to Claim Nos. 24 and 84.

⁴ No changes have been made to the Proposed Order.

Dated: September 23, 2025
Wilmington, Delaware

/s/ Shella Borovinskaya

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